

# **Exhibit A**

**Laura A. Rabb, Esq.**  
**I.D.#: 028321997**  
**RABB HAMILL, P.A.**  
**284 Amboy Avenue**  
**Woodbridge, NJ 07095**  
**(732) 636-9291**  
**Attorneys for Plaintiff(s)**

**CHANDRA MEGGIE-BERNARD,**

**Plaintiff,**

**vs.**

**RUSSELL PLYWOOD INC AND DAVID RALPH  
RAMIEREZ,**

**Defendant(s).**

**SUPERIOR COURT OF NEW JERSEY**  
**LAW DIVISION: ESSEX COUNTY**  
**DOCKET NO.: ESX L 003768-21**

**CIVIL ACTION**

**SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above: ***RUSSELL PLYWOOD INC***  
The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

***/S/ MICHELLE M. SMITH***

**Clerk of the Superior Court**

**DATED: May 12, 2021**

**Name of Defendant to Be Served: RUSSELL PLYWOOD INC**

**Address of Defendant to Be Served: 3 MCCULLOUGH DR, NEW CASTLE, DE 19720**

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Laura A. Rabb, Esq.  
I.D.#: 028321997  
RABB HAMILL, P.A.  
284 Amboy Avenue  
Woodbridge, NJ 07095  
(732) 636-9291  
Attorneys for Plaintiff(s)

CHANDRA MEGGIE-BERNARD,

Plaintiff,

vs.

RUSSELL PLYWOOD INC AND  
DAVID RALPH RAMIEREZ,

Defendant(s).

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY  
DOCKET NO.

CIVIL ACTION

**COMPLAINT AND JURY DEMAND**

Plaintiff, Chandra Meggie-Bernard, residing at 20 Rich Street, in the Twp of Irvington,  
County of Essex, State of New Jersey, by way of complaint against the defendants, says:

**FIRST COUNT**

1. On or about November 9, 2020, the plaintiff Chandra Meggie-Bernard, was the owner and operator of a motor vehicle which was lawfully and properly stopped westbound on Route 22, in the Twp of Bridgewater, County of Somerset, State of New Jersey.

2. At the time and place aforesaid, the defendant, Russell Plywood Inc., was the owner of a motor vehicle which was being operated by its agent servant and or employee defendant David Ralph Ramirez which was traveling westbound on Route 22, in the Twp of Bridgewater, County of Somerset, State of New Jersey.

3. At the time and place aforesaid, the defendant, Russell Plywood Inc., through its agent servant and or employee defendant, David Ralph Ramirez, so negligently and carelessly operated his motor vehicle that he was caused to strike and collide with the rear of the stopped

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vehicle driven by plaintiff, Chandra Meggie-Bernard, causing plaintiff,  
Chandra Meggie-Bernard to sustain serious personal injury.

4. As a direct and proximate result of the aforesaid joint, several and or individual negligence of the defendants, Russell Plywood Inc. and David Ralph Ramirez, the plaintiff, Chandra Meggie-Bernard, sustained serious personal injuries both temporary and permanent in nature, she suffered and will suffer past, present and future pain and suffering, she was and will be obliged to spend money on doctor bills, hospital bills, care and medicine in an effort to cure and alleviate her injuries, and she was and will be unable to pursue the usual course of her occupation and duties, all to her damage.

**WHEREFORE**, the plaintiff, Chandra Meggie-Bernard, demands judgment against the defendants, Russell Plywood Inc. and David Ralph Ramirez, jointly, severally and or individually, for money damages plus cost of suit on the First Count.

**JURY DEMAND**

Plaintiff, demands a trial by jury as to all issues herein contained.

**DEMAND FOR INSURANCE INFORMATION**

Pursuant to R. 4:10-2(b), plaintiff hereby demands production within 30 days of a copy of the contents of any insurance agreement under which the defendants may be covered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**DESIGNATION OF TRIAL COUNSEL**

Plaintiffs designates Edward K. Hamill, Esq., 025861982 as Trial Counsel pursuant to Rule 4:25-4.

**CERTIFICATION**

Laura A. Rabb, of full age, hereby certifies as follows:

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1. That the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.

2. I know of no other party or person who should be joined in this action.

3. This certification is made pursuant to Rule 4:5-1.

4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

RABB HAMILL, P.A.

BY:

  
LAURA A. RABB, ESQ.

Dated: May 7, 2021

ESX L 003768-21 05/12/2021 4:17:47 AM Pg 1 of 1 Trans ID: LCV20211183226

ESSEX COUNTY - CIVIL DIVISION  
SUPERIOR COURT OF NJ  
465 MARTIN LUTHER KING JR BLVD  
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 776-9300  
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 11, 2021  
RE: MEGGIE-BERNARD CHANDRA VS RUSSELL PLYWOOD INC  
DOCKET: ESX L -003768 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON LISA M. ADURATO

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001  
AT: (973) 776-9300 EXT 57395.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: LAURA A. RABB  
RABB HAMILL P.A.  
284 AMBOY AVENUE  
WOODBIDGE NJ 07095-0579

ECOURTS

# **Exhibit B**

**WILSON ELSEER MOSKOWITZ EDELMAN & DICKER, LLP**

Andrew J. Heck, Esq. (11802012)

Christopher W. McClanahan (No. 42331996)

200 Campus Drive

Florham Park, New Jersey 07932

T. (973) 624-0800

F. (973) 624-0808

Attorneys for Defendants, Russell Plywood Inc. DE (i/p/a Russell Plywood, Inc.) and David  
Ralph Ramierez

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CHANDRA MEGGIE-BERNARD,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: ESSEX COUNTY
	:	DOCKET NO: ESX-L-3768-21
Plaintiff,	:	
v.	:	<u>Civil Action</u>
	:	
RUSSELL PLYWOOD INC AND DAVID	:	<b>VIA ECOURT FILING</b>
RALPH RAMIEREZ	:	
	:	
	:	
Defendants.	:	

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**NOTICE OF FILING OF REMOVAL TO UNITED STATES DISTRICT COURT**

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. § 1446(a), Defendants, Russell Plywood Inc. DE (i/p/a Russell Plywood, Inc.) and David Ralph Ramierez (hereinafter "Defendants"), by and through the undersigned attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, on this date have filed a Notice of Removal of a Civil Action from the Superior Court of New Jersey, Law Division, Essex County, Docket No. ESX-L-3768-21, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto and made part hereof.

PLEASE TAKE FURTHER NOTICE, that Defendants, Russell Plywood Inc. DE (i/p/a Russell Plywood, Inc.) and David Ralph Ramierez, hereby file this Notice and Petition with the



Essex County Clerk of the Superior Court of New Jersey, Law Division, in accordance with 28  
U.S.C. § 1446.

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, Russell Plywood Inc. DE (i/p/a Russell  
Plywood, Inc.) and David Ralph Ramirez

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
Andrew.Heck@wilsonelser.com

Dated: July 12, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on behalf of Defendants, Russell Plywood Inc. DE (i/p/a Russell Plywood, Inc.) and David Ralph Ramierez, I caused the within Notice of Filing of Removal to be served via Electronic Filing, upon:

Clerk  
New Jersey Superior Court  
465 Dr. Martin Luther King Jr. Boulevard  
Newark, New Jersey 07102

Laura Rabb, Esq.  
Rabb Hamill, PA  
284 Amboy Ave.  
Woodbridge, NJ 07095  
Attorneys for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants, Russell Plywood Inc. DE (i/p/a Russell Plywood, Inc.) and David Ralph Ramierez

By: /s/ Andrew J. Heck  
Andrew J. Heck. (11802012)  
Andrew.Heck@wilsonelser.com

Dated: July 12, 2021